

**REMARKS/ARGUMENTS**

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Claims 1-9 were pending prior to the Office Action.

**A. SUMMARY OF THIS AMENDMENT**

By the current amendment, Applicants basically:

1. Editorially amend the specification.
2. Amend claims 1-9.
3. Add new claims 10-17.
4. Respectfully traverse all prior art rejections.

**B. OBJECTION TO THE SPECIFICATION**

The specification is objected to for minor informalities. The specification is amended to address the issues raised. Applicants respectfully request that the objection to the specification be withdrawn.

**C. OBJECTION TO THE DRAWINGS**

Figs. 1 and 2 are objected to for informalities. A drawing change request is separately submitted herewith in which all objections to the drawings are addressed. The drawing amendments also include changes to enhance

consistencies with the specification. No new matter is added. Applicants respectfully request that the objections to the drawings be withdrawn.

**D. OBJECTION TO THE CLAIMS**

Claims 1, 5 and 7-9 stand objected to for informalities. These claims are amended to address the issues raised. Applicants respectfully request that the objections to the claims be withdrawn.

**E. PATENTABILITY OF THE CLAIMS**

In the Office Action, the Examiner makes the following rejections:

- claims 1-3 and 7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chaskar (U.S. Publication No. 2004/0196808) in view of Karagiannis (U.S. Publication No. 2003/0018810);
- claims 4, 8 and 9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chaskar in view of Karagiannis, and further in view of Krishnamurthi (U.S. Publication No. 2003/0174667); and
- claims 5 and 6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chaskar in view of Hsu (U.S. Publication No. 2004/0176024), and further in view of Karagiannis.

For a Section 103 rejection to be proper, a prima facie case of obviousness must be established. See M.P.E.P. 2142. One requirement to establish prima facie case of obviousness is that the prior art references, when

combined, must teach or suggest all claim limitations. *See M.P.E.P. 2142; M.P.E.P. 706.02(j)*. Thus, if the cited references fail to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

Independent claim 1 recites, in part “wherein no IP control plane signalling is used for transmitted the translated CARD information from the access router to the user terminal.” In the Office Action, the Examiner relies upon a combination of Chaskar and Karagiannis to allegedly teach or suggest the features of claim 1. Both Chaskar and Karagiannis are directed to providing seamless handoff using IP control messages. The titles of Chaskar “Protocol to Determine Optimal Target Access Routers For Seamless IP-Level Handoff” and Karagiannis “Seamless Handoff In Mobile IP” suggest as much. In the description, Chaskar states “each access router includes ... a block of IP addresses that can be allocated and used by the access router for communicating with mobile terminals served by the access router.” *See [0023]*. Similarly, Karagiannis states “in order to accomplish this piggy-backing, the Layer 2 protocol should be able to interface or otherwise be compatible with Mobile IPv4.” *See [0088]*. Both Chaskar and Karagiannis specifically teach away from the above recited feature. This is sufficient to distinguish independent claim 1 from the combination of Chaskar and Karagiannis.

Neither Hsu nor Krishnamurthi corrects the above-noted deficiencies of Chaskar and Karagiannis. Therefore, independent claim 1 is distinguishable over any combination of Chaskar, Karagiannis, Hsu and Krishnamurthi.

Independent claim 5 recites, in part “wherein no IP control plane signaling is used in the broadcasted translated CARD information in the transmitted CARD information.” Thus, for similar reasons, claim 5 is distinguishable over any combination of the same references. Claims 2-4 and 6-9 are distinguishable over any combination of the cited references by virtue of their dependencies from independent claim 1 as well as on their own merit.

Applicants respectfully request that the rejection of claims 1-9 based on Chaskar, Karagiannis, Hsu and Krishnamurthi be withdrawn.

**F. NEW CLAIMS**

Claims 10-17 are added in this Reply. No new matter is presented. Applicants respectfully submit that the new claims are distinguishable over the cited references individually or in any combination thereof.

Applicants respectfully request that the new claims be allowed.

**G. CONCLUSION**

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

AMENDMENT  
U.S. Application No. 10/584,491

Atty. Docket No.: 2380-1343  
Art Unit No.: 2416

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By: \_\_\_\_\_



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